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January 18, 2022

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
Via E-Filing

Reply to:

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RE: Hanover Insurance Co. v. NY Firetech, Inc., Et Al.
Case No.: 1:21-cv-02728-MKV

Dear Judge Vyskocil:

I represent the Plaintiff in the above-referenced matter.

A court conference is currently scheduled for January 25, 2022, and the parties were required to submit a proposed case management plan by January 17, 2022.

I am writing this letter to respectfully request that the conference and the deadline for submitting a case management plan be adjourned by two (2) more weeks. This is a second request to adjourn the conference because the conference was initially scheduled for January 4, 2022 and then it was adjourned per parties' request.

This is a joint request by all parties. The parties are making this request because the parties are very close to amicably resolving the matter. Although the parties believed that they would be able to finalize the terms of the settlement sooner, there are some aspects of the settlement agreement that still need to be worked out. The parties have been diligently working on settling the matter and I am certain that the parties would be able to finalize the settlement and file the necessary documents with the court by February 4, 2022.

In light of the foregoing, the parties respectfully ask this Honorable Court to adjourn the January 25, 2022 conference and the case management plan filing deadline by two (2) weeks.

Very truly yours,

VKushnir

Vlad Kushnir, Esq.

GRANTED. The initial pretrial conference scheduled for January 18, 2022 at 10:00 AM is ADJOURNED to February 22, 2022 at 11:30 AM. SO ORDERED.

Date: 1/19/2022
New York, New York


Mary Kay Vyskocil
United States District Judge